

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

INTEGRATED TECHNOLOGIES,)	
INTERNATIONAL, LLC,)	
)	
Plaintiff,)	
)	Civil Action File No.:
v.)	
)	
YANFENG NORTH AMERICA,)	
YANFENG US AUTOMOTIVE)	
INTERIOR SYSTEMS I LLC, and)	
YANFENG AUTOMOTIVE)	
INTERIORS,)	
)	
Defendants.)	

NOTICE OF REMOVAL

Defendants Yanfeng International Automotive Technology US I LLC d/b/a Yanfeng North America (“Yanfeng North America”), Yanfeng US Automotive Interior Systems I LLC n/k/a Yanfeng International Automotive Technology US I LLC (“Yanfeng International”), and Yanfeng International Automotive Technology US I LLC d/b/a Yanfeng Automotive Interiors (“Yanfeng Automotive”) remove the action in the Superior Court of Cobb County, Georgia, styled *Integrated Technologies, International, LLC v. Yanfeng North America, et. al.*, Case No. 23108848 (the “Superior Court Action”) pursuant to 28 U.S.C. §§ 1332, 1441, and 1446. In support of this Notice of Removal, Defendants further state:

BACKGROUND

1. On November 10, 2023, Plaintiff Integrated Technologies, International, LLC (“Integrated Technologies”) filed the Superior Court Action.
2. On November 15, 2023, Yanfeng International was served with the Complaint and Summons.
3. The Complaint purports to assert claims for (1) breach of contract; (2) fraud; and (3) attorney’s fees and expenses.
4. Based on these causes of action, Plaintiff Integrated Technologies seeks \$232,618.81 from Defendants. (Ex. A, Compl. ¶ 15).
5. Integrated Technologies is a domestic limited liability company with its principal office address located at 1680 Roberts Blvd, Suite 406, Kennesaw, GA 30144, Cobb County, GA.
6. The Complaint alleges that Yanfeng North America “is an entity apparently based in Michigan and may be served with process at 41935 West 12 Mile Road, Novi, Michigan 48377.” (*Id.* ¶ 1).
7. The Complaint alleges that Yanfeng International “is an entity that was previously authorized to transact business in the State of Georgia and which maintained its registered agent as CT Corporation System, Inc. at 1201 West Peachtree Street, Atlanta, Fulton County, Georgia, but failed to maintain its registration as required by law, consequently, the Georgia Secretary of State

revoke[d] Yanfeng US's authority to transact business in the State of Georgia.”
(*Id.* ¶ 2).

8. The Complaint alleges that Yanfeng Automotive “is a company transacting business and maintains a principal place of business at 101 International Boulevard, Fountain Inn, South Carolina 29644.” (*Id.* ¶ 3).

Diversity Jurisdiction under 28 U.S.C. § 1332(a)

9. This Court has jurisdiction over this action pursuant to 28 U.S.C. § 1332 because complete diversity of citizenship exists between the parties and because the amount in controversy exceeds \$75,000, exclusive of interest and costs.
10. Plaintiff Integrated Technologies is a domestic limited liability company organized under the laws of the State of Georgia.
11. Daniel Welton is the sole member of Integrated Technologies and is a citizen of Georgia.
12. Integrated Technologies is a citizen of Georgia for purposes of diversity jurisdiction.
13. Defendant Yanfeng International is a foreign limited liability company organized under the laws of the State of Delaware, with its principal place of business at 41935 W. 12 Mile Road, Novi, Michigan, 48377.

14. The sole member of Yanfeng International and its state of residency are as follows: Yanfeng International Automotive Technology US LLC (Delaware).
15. The sole two members of Yanfeng International Automotive Technology US LLC are as follows: Yanfeng International Automotive Technology Hungary Kft. (a company incorporated under the laws of Hungary) and Yanfeng International Automotive Technology Co., Ltd. (a company incorporated under the laws of the People's Republic of China ("China")).
16. Yanfeng International Automotive Technology US LLC is the sole member of Yanfeng International. Yanfeng International Automotive Technology Hungary Kft. and Yanfeng International Automotive Technology Co., Ltd. are the sole two members of Yanfeng International Automotive Technology US LLC. Therefore, Yanfeng International is a citizen of Hungary and China for diversity purposes.
17. There is no separate legal entity by the name of "Yanfeng North America". Instead, named Defendant Yanfeng International uses the phrase "Yanfeng North America" to refer to Yanfeng International. As noted, Yanfeng International is a citizen of Hungary and China for diversity purposes. Therefore, Defendant Yanfeng North America is a citizen of Hungary and China for diversity purposes.

18. There is no separate legal entity by the name of “Yanfeng Automotive Interiors”. Instead, named Defendant Yanfeng International uses the phrase “Yanfeng North America” to refer to Yanfeng International. As noted, Yanfeng International is a citizen of Hungary and China for diversity purposes. Therefore, Defendant Yanfeng Automotive is a citizen of Hungary and China for diversity purposes.

19. The amount in controversy exceeds \$75,000 because Integrated Technologies is seeking \$232,618.81 in damages.

All Procedural Requirements are Satisfied

20. Pursuant to 28 U.S.C. § 1446(a), true and correct copies of all of the process, pleadings, orders, and documents from the Superior Court Action which have been served on Defendants are being filed with this Notice of Removal as Exhibit A.

21. A copy of this Notice of Removal will be served upon the Plaintiff and filed with the Clerk of the Superior Court of Cobb County as required by 28 U.S.C. § 1446(d).

22. The Superior Court Action is removable to this Court under 28 U.S.C. §§ 1441(a) and 1446(a) because this U.S. District Court for the Northern District of Georgia is the federal judicial district embracing the Superior Court of Cobb County.

23. This Notice of Removal is filed within thirty dates of service of the Complaint on Yanfeng International. Removal is thus timely under 28 U.S.C. § 1446(b).

WHEREFORE, Defendants respectfully request that this action proceed in this Court as an action properly removed to it.

Respectfully submitted, this 14th day of December, 2023.

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**Pro Hac Vice applications to be filed*

Counsel for Defendants

CERTIFICATE OF COMPLIANCE

The undersigned hereby certifies that the foregoing pleading complies with the font and point selections approved by the court in Local Rule 5.1C. This pleading has been prepared in Times New Roman font, 14-point.

CERTIFICATE OF SERVICE

I hereby certify that on December 14, 2023, a true and correct copy of the foregoing was e-filed through the CM/ECF system. I further certify that I have served the foregoing upon the following counsel of record for the Plaintiff via email.

Brendan J. McCarthy
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I further certify that I have served a copy of the same upon the Cobb County Superior Court clerk by electronic filing with that Court.

Respectfully submitted this 14th day of December, 2023.

/s/ Henry D. Fellows, Jr.
Henry D. Fellows, Jr.